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15 Companies Worldwide, Inc. and K-Kel, Inc.

16 **UNITED STATES DISTRICT COURT**

17 **FOR THE DISTRICT OF NEVADA**

18 The Spearmint Rhino Companies Worldwide,  
19 Inc. and K-Kel, Inc.,

20 Plaintiffs,

21 vs.

22 Chang's Dynasty LLC and Alan Chang,

23 Defendants.

24 Civil Action No. 2:23-cv-02040-ART-BNW

25 Honorable Anne R. Traum  
26 Magistrate Judge Brenda Weksler

27 **STIPULATION AND [PROPOSED]  
28 ORDER TO EXTEND DISCOVERY  
(SECOND REQUEST)**

29 Plaintiffs The Spearmint Rhino Companies Worldwide, Inc. and K-Kel, Inc.

30 ("Plaintiffs") and Defendants Chang's Dynasty LLC and Alan Chang ("Defendants")

31 (collectively, "the Parties") hereby stipulate as follows pursuant to LR IA 6-1 and LR 26-3:

32 **I. COMPLETED DISCOVERY**

33 The Parties have engaged in considerable discovery, with Plaintiffs and Defendants  
34 having served multiple sets of interrogatories and requests for production. The parties have also

1 exchanged numerous documents. The parties are actively working to schedule depositions at  
 2 mutually convenient times.

### 3           **II.       REMAINING DISCOVERY**

4           While some responses to written discovery remain outstanding, the parties have agreed ,  
 5 absent extraordinary circumstances, not to serve further written discovery, except for deposition  
 6 notices and subpoenas. Further, the Parties presently anticipate needing to take 1 – 5 individual  
 7 depositions each, and depositions of corporate parties under Fed. R. Civ. P. 30(b)(6). Once fact  
 8 discovery is complete, the Parties expect to disclose experts and take expert depositions.

### 9           **III.      THERE IS GOOD CAUSE TO EXTEND THE DISCOVERY DEADLINE**

10          The parties agreed to an ambitious discovery schedule and have worked diligently and  
 11 cooperatively to complete discovery by the current discovery deadline. However, unexpected  
 12 events have prevented the parties from doing so and thus necessitated this request for  
 13 additional time. More specifically, one of Plaintiff's principals, who is approximately 80 years  
 14 old, has tested positive for COVID and presently remains under a physician's care. This  
 15 resulted in his deposition being postponed. Further, the principals of the Parties have engaged  
 16 in discussions in hopes that they might find a path to resolve this matter.

17          For these reasons, the parties have conferred and respectfully requests a 60-day  
 18 extension of the discovery deadline and case schedule.

### 19           **IV.       PROPOSED EXTENSION**

21	22
Close of Fact Discovery	September 30, 2024
F.R.C.P. 26(a)(2) Disclosures	October 28, 2024
Disclosure of Rebuttal Experts	November 25, 2024
Expert Discovery Closes	December 20, 2024
Dispositive Motions	January 20, 2025
Pretrial Order	February 18, 2025
	April 18, 2025, but if dispositive motions are

1		timely filed, then the date for filing the joint pretrial order shall be suspended until thirty (30) days after decisions on any dispositive motions, or upon further order of the Court extending the time period in which to file the joint pretrial order
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8  
9 Dated: September 9, 2024

STRADLING YOCOA CARLSON & RAUTH LLP

10 By: /s/ Douglas Q. Hahn  
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Elizabeth Erickson

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19 Marc J. Randazza  
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20 *Attorneys for Defendants  
Chang's Dynasty LLC and Alan Chang*

21  
22  
23 **IT IS SO ORDERED**

24  
25   
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: September 10, 2024

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that a true and correct copy of the document is being served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Douglas Q. Hahn